SOUTH ISLAND LOCAL GOVERNMENT

A Ratepayer-Centred Alternative Framing

Submitted for the public record under the Head Start process

13 August 2026

1. Purpose of this Submission

This document is lodged for the public record. It responds to the decision by a major non-council organisation to submit a full redesign of South Island local government under the Head Start process, despite not having been invited as a submitting party.

If the process is prepared to treat an unsolicited redesign from a non-elected organisation as legitimate input, consistency requires that ordinary ratepayers — the people who fund and live under the structures being redesigned — must also be able to place a coherent alternative on the record.

This submission does exactly that. It sets out clearer organising principles, confronts the infrastructure funding reality that larger boundaries alone do not solve, and insists that redesign must not become a vehicle for burying existing deficits.

2. The Process Asymmetry

Head Start was directed at councils — elected bodies that currently hold statutory responsibility for local government. A major iwi organisation whose primary accountability is to its members has nevertheless lodged a full boundary and structural redesign covering most of the South Island.

Ordinary ratepayers have no equivalent formal channel and no comparable institutional standing. This creates a clear double standard: one category of non-elected actor can insert a redesign of elected local government into the official conversation; another category (the people who pay the rates) cannot do so with any realistic prospect of equal treatment.

That asymmetry is recorded here as a matter of public interest. It is not a complaint about any particular organisation. It is a statement about the neutrality of the process itself.

3. Superior Organising Principles

Any redesign of local government that claims to serve future generations must be built on principles that can be defended in public. The following are proposed as clearer and more coherent than those advanced to date.

3.1 Democratic accountability first

The people who live in and fund the structures must retain the primary ability to elect and remove those who make decisions about rates, services, and land-use. Residual local voice cannot be an afterthought attached to larger entities; it must be structurally protected with real decision rights, not merely advisory boards.

3.2 Ratepayer standing

Those who pay the rates are not merely stakeholders to be consulted after the design is largely settled. They are the democratic constituency. Any process that gives greater practical weight to non-ratepayer organisations than to the ratepaying public fails a basic test of legitimacy.

3.3 Infrastructure funding reality

Larger councils do not automatically solve under-investment. Recent evidence from the South Island shows chronic under-funding relative to network responsibility and economic contribution: the region generates 22% of GDP and manages 43% of the national road network, yet receives only 11% of National Land Transport Fund roading expenditure. Bridges are already forcing multi-million-kilometre freight detours; some sealed roads face reversion to gravel. Any redesign that does not confront the central funding vacuum for flood protection, roading, and related infrastructure simply relocates the problem into larger balance sheets.

3.4 Catchment logic done properly

Natural water catchments are a rational scale for some infrastructure and environmental functions. They are not automatically a superior scale for all local government functions — libraries, local roads, community facilities, regulatory services, and many rating decisions still require closer democratic proximity. A coherent redesign would distinguish which functions genuinely benefit from catchment or regional scale and which require residual local control.

3.5 No inheritance of unresolved gaps

Amalgamation or boundary redesign must not be allowed to bury existing infrastructure deficits, deferred maintenance, or incomplete comparative analysis of protection versus managed retreat pathways. Those gaps must be quantified and carried forward as explicit liabilities of the new entities. Redesign that simply resets the organisational clock without accounting for inherited shortfalls transfers the cost onto future ratepayers without their consent.

4. High-Level Alternative Structure

The following is offered as a clearer organising logic than the models publicly described so far:

1. Retain or create a limited number of larger strategic entities only for those functions that demonstrably require catchment or regional scale (major flood protection, key arterial transport, bulk water, specialist shared services).
2. Preserve strong residual local councils or boards with real decision rights over the rates that fund local services, local land-use, and community facilities. Advisory boards alone are insufficient.
3. Require every new or enlarged entity to publish, within its first year, a full inventory of inherited infrastructure deficits and the comparative cost of protection versus retreat pathways in high-risk areas.
4. Guarantee that any shared services entity remains under the direct democratic control of the elected councils it serves, not a parallel governance track.
5. Treat ratepayer standing as a formal design criterion from the outset, not an optional consultation exercise after the major decisions have been made.

5. Why This Framing Is Stronger

It does not pretend that scale alone solves funding shortfalls. The South Island already demonstrates that larger geographic responsibility without matching funding produces deferred maintenance, higher long-term costs, and tangible community impacts.

It does not treat democratic proximity as a residual afterthought. Local voice with real decision rights is a design requirement, not a consolation prize.

It does not allow redesign to become a vehicle for burying existing infrastructure liabilities. Those gaps remain visible and must be quantified.

And it insists that the people who pay for local government retain primary standing in its redesign. Those are higher tests than simply drawing larger lines on a map around river catchments.

6. Request

This document is submitted for the public record and for consideration alongside other Head Start inputs. It is offered on the same basis as any other non-council contribution: as a coherent alternative framing that prioritises democratic accountability, ratepayer standing, and infrastructure funding reality.

If the process is prepared to engage with redesign proposals from organisations that were not invited, it should be prepared to engage with this one on its merits.

Submitted for the public record,
Independent researcher
13 August 2026